

From: [Jonathan Goldstein](#)
To: [Robert Harrington](#); [Chad Pehrson](#)
Cc: [David Osborne](#); [Stephen Richards](#)
Subject: RE: Response to Discovery Requests
Date: Friday, January 10, 2025 1:18:02 PM

- EXTERNAL EMAIL -

Thanks for this letter. I'm shutting down shortly for Shabbos.

I am working to find a time to review the letter with my clients. I hope to be back to you next week with a response to your proposed limitations.

In the meantime, I'm confirming again that I'll be out of the country from January 19th, through and including the 27th and neither Mr. nor Mrs. Simkiss will be able to make dates that week work for a deposition.

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Jonathan S. Goldstein, Esq.

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The best way to reach me is email.

From: Robert Harrington <rharrington@kba.law>
Sent: Wednesday, January 8, 2025 11:43 PM
To: Jonathan Goldstein <jgoldstein@goldsteinlp.com>; Chad Pehrson <cpehrson@kba.law>
Cc: David Osborne <dosborne@goldsteinlp.com>; Stephen Richards <srichards@kba.law>
Subject: RE: Response to Discovery Requests

Jonathan,

It was nice to speak with you the other day. Please find attached correspondence from our office.

Please let us know about potential deposition dates. I am around tomorrow and Friday if you would like to discuss.

Thanks,
Bobby

From: Jonathan Goldstein <jgoldstein@goldsteinlp.com>

Sent: Thursday, December 26, 2024 11:54 AM

To: Chad Pehrson <cpehrson@kba.law>; Robert Harrington <rharrington@kba.law>

Cc: David Osborne <dosborne@goldsteinlp.com>

Subject: Response to Discovery Requests

- EXTERNAL EMAIL -

Chad and Bobby,

Please see attached correspondence with regard to your discovery requests to Mr. and Mrs. Simkiss and to H2E Americas LLC.

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